



**Iascach Intíre Éireann
Inland Fisheries Ireland**

MARINE LICENCE VETTING COMMITTEE:

MUL260021

Request for observations from Ms. Paula O'Toole (MARA) dated 22.04.2026

Overview:

The Department of Climate, Energy and Environment has submitted an application to the Maritime Area Regulatory Authority (MARA) for a Maritime Usage Licence under Section 117 of the Maritime Area Planning Act 2021 (the MAP Act) to undertake geophysical, geotechnical, metocean and biological surveys to inform future offshore renewable energy development in the South Coast DMAP

Site investigations will include geophysical, geotechnical, metocean, and biological surveys. Surveying for marine data is a crucial step in the preparation for Offshore Renewable Electricity Support Scheme (ORESS) auctions.

IFI Comment

IFI note that there is no mention of diadromous fish species or marine recreational species in the application supporting documents that are under IFI's remit.

There is a paucity of species-specific knowledge with regard to the effects of anthropogenic noise on fish, however, it is known that fish, including salmon and twaite shad, are sensitive to particle motion which is integral to hearing in all fish. Operations which emit underwater noise may result in changes to sound pressure and particle motion waves that propagate through water. Effects can include masking of biologically important sounds, hearing impairment, stress responses and behavioural changes.

IFI would point out that the mitigation measures and guidance of NPWS in regard to marine mammals are not transferrable to fish species. The fish remain invisible to any shore- or boat-based observer. Mitigation measures should aim to reduce the sound generated, in intensity and duration. The use of soft-start and ramp-up procedures for any sound-generating surveys undertaken – both on a day-to-day basis and on re-start after any stoppages within any day should be undertaken. This measure should be a condition of the licence. The comments of IFI in this regard relate to fish species of conservation significance and of leisure angling significance all of which constitute part of IFI's brief.



**Iascach Intíre Éireann
Inland Fisheries Ireland**

There is very little information about the habitat use of diadromous fish in coastal waters or on identifying the migration routes of these species as they migrate from freshwater to the marine environment. Habitat Directive listed species include Salmon, Twaité shad, sea lamprey and river lamprey will be migrating across these site investigation and potential ORE sites at different times of the year. There are important elasmobranch habitat along this coastline and many sharks and rays are listed as having a threatened and endangered status. The proposed ecological surveys should include diadromous and recreational fish and the presence of elasmobranch and their required habitat.

There are other techniques that can be employed as a way of adding to the traditional sampling surveys planned these include Environmental DNA surveys and telemetry surveys. There is a possibility of capturing the fish (diadromous and marine) that use the waters around the proposed site using metabarcoding techniques. Efforts to fill the extensive knowledge gaps in this area would be very worthwhile to ensure no significant effects are occurring on our diadromous and marine recreational fish species.

Ciara O'Leary (IFI Research)
22/05/2026